

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

MAR 16 2021

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) CAUSE NO.
)
 DEEON FLOWERS,) 1 : 21 -cr- 0 0 8 9 JPH -MJD
)
 Defendant.)

INDICTMENT

The Grand Jury charges that:

COUNT 1
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about October 17, 2020, within the Southern District of Indiana, DEEON FLOWERS, the defendant herein, did knowingly possess in commerce and affecting commerce a firearm, to wit:, a Taurus, model G2C 9mm semiautomatic handgun, after having been knowingly convicted of a crime punishable by a term of imprisonment exceeding one (1) year, to wit:

Theft, a D felony, under Marion County (Indiana) cause number 49G01-1210-FD-073033 on or about March 7, 2013; and/or,
Robbery, a B Felony, under Marion County (Indiana) cause number 49G01-1205-FB-029229 on or about July 10, 2012,

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT 2
18 U.S.C. § 922(g)(1)
Possession of Ammunition by a Convicted Felon

On or about October 17, 2020, within the Southern District of Indiana, DEEON FLOWERS, the defendant herein, did knowingly possess in commerce and affecting commerce ammunition, to wit: 5 live rounds of Federal Cartridge 9 mm ammunition, 3 live rounds of Speer 9 mm ammunition, and 1 live round of S&B 9 mm ammunition, after having been knowingly convicted of a crime punishable by a term of imprisonment exceeding one (1) year, to wit:

Theft, a D felony, under Marion County (Indiana) cause number 49G01-1210-FD-073033 on or about March 7, 2013; and/or,

Robbery, a B Felony, under Marion County (Indiana) cause number 49G01-1205-FB-029229 on or about July 10, 2012,

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE

1. Pursuant to Federal Rule of Criminal Procedure 32.2, the United States hereby gives the defendant notice that the United States will seek forfeiture of property, criminally and/or civilly, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), as part of any sentence imposed.

2. Pursuant to Title 18, United States Code, Section 924(d), if convicted of the offense set forth in Counts 1 or 2 of this Indictment, the defendant shall forfeit to the United

States “any firearm or ammunition involved in” the offense.

3. The property subject to forfeiture includes, but is not necessarily limited to, the following:

- a. One Taurus, model G2C, 9mm semiautomatic handgun bearing serial number TMT20966;
- b. Any magazines and ammunition associated with the offense.

4. In addition, the United States may seek civil forfeiture of the property described above in paragraph 3 pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

JOHN E. CHILDRESS
Acting United States Attorney

By:

Kelsey L. Massa
Assistant United States Attorney